

## REMARKS

### I. INTRODUCTION

In response to the Office Action dated March 22, 2001, claims 1, 12, 23, and 34 have been amended. Claims 1-34 remain in the application. Entry of these amendments, and re-consideration of the application, as amended, is requested.

### II. PRIOR ART REJECTIONS

In paragraphs (11)-(12) of the Office Action, claims 1-8, 11-19, 22-30, and 33-34 were rejected under 35 U.S.C. §103(a) as being unpatentable over Foley et al., U.S. Patent No. 5,706,502 (Foley), in view of Arora et al., U.S. Patent No. 5,911,145 (Arora), and further in view of Francis et al., U.S. Patent 6,182,092 (Francis). In paragraph (14) of the Office Action, claims 9-10, 20-21, and 31-32 were rejected under 35 U.S.C. §103(a) as being unpatentable over Foley, Arora, and Francis as applied to claims 1, 12, and 23 above, and further in view of Lisle et al., U.S. Patent No. 6,069,630 (Lisle).

The Office Action rejections claim 1 as follows:

In regard to independent claim 1, Foley teaches:

- project files within a portfolio file, said portfolio file containing references to members of a set of project files, said project file containing a URL of an HTML file including an applet tag (Foley column 2 lines 55-63, column 8 lines 57-59, Figure 3 item 170A; compare with claim 1 "*reading information from a project file...*"),

- Foley does not specifically teach a relationship between a form element and an HTML page and its associated HTML file. However, Francis teaches embedded from objects in an HTML page (said page processing a file name), whereby a relationship between form objects within said HTML page is generated with the help of a "Structured Language Element-to-Embeddable Object Class Association Table" (Francis column 4 lines 45-52, column 10, lines 53-64, column 14 lines 55-61; compare with claim 1 "*...the information comprising a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page*", and "*from the form*"). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Francis to Foley, because of Francis's taught advantage of defining relationships in order to provide editing of pages and forms within a single environment (as taught by Francis), to the single portfolio environment of Foley (See Francis column 4 lines 25-30).

- processing an applet referenced in each web document (Foley column 5, lines 32-49); compare with claim 1 "*processing the information to map the element to the HTML file*").

- Foley does not specifically teach the display of mapped elements to an HTML file.

However, Arora teaches the displayed mapping of elements to an HTML page (Arora column 14 lines 32-36, Figures 22, 42; compare with claim 1 "*displaying the mapping*"). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Arora to Foley, because of the advantage of visibly showing files, links, and objects of an HTML page in an organized fashion that Arora brings to Foley.

Applicants respectfully traverse these rejections for one or more of the following reasons:

(1) *Neither Foley, Francis, nor Arora teach, disclose, or suggest an element that has been transferred from a form to an HTML page;*

(2) *Neither Foley, Francis, nor Arora teach, disclose, or suggest providing a mapping from an element transferred from a form to an HTML file associated with an HTML page; and*

(3) *Neither Foley, Francis, nor Arora teach, disclose, or suggest displaying a mapping from an element to an HTML file in a graphical user interface that indicates the relationship between the element, the form, and the HTML file.*

Applicants have amended the claims to provide that the mapping is displayed in a graphical user interface. The graphical user interface indicates the relationship between the element, the form that the element was transferred from, and an HTML file that the element was transferred to. Such claim language illustrates that the user may easily view the relationships of objects involved in the creation of a web page in a graphical user interface. Such viewing capability may further allow a user to easily manipulate a page and various elements in a page using a tool for building an HTML page (associated with an HTML file). Further, as described in the specification, since the form contains one or more elements, and many instances of an element may be used in various HTML pages, only one copy of the form (that includes the element) needs to be retrieved locally (see page 15, lines 1-5). Accordingly, processing and transfer time are optimized.

Once the information is read from the project file that contains the relationship between the element and a particular HTML file, the information is processed to obtain a mapping from the element in the form to the HTML file. Once obtained, the mapping is displayed in a graphical user interface. The graphical user interface allows the user to identify the element in the HTML file, the form where the element was transferred from, and the HTML file where the element was transferred to.

The Office Action admits that Foley fails to teach the relationship between a form element and an HTML page and its associated HTML file and utilizes Francis to teach this claim element. More specifically, the Office Action uses Francis' "Structured Language Element-to-Embeddable Object Class Association Table" (hereinafter referred to as "Table") to provide for the relationship. Col. 16, lines 43 - col. 17, line 8 describes such a Table. As described in Francis, the Table merely comprises an HTML tag component 226 with an object class identifier (CLSID) 234 (see col. 16, lines 48-50). Accordingly, the Table is merely a list of tag components and an identifier for an

object used to create the component. As further illustrated in Francis, when an HTML tag is identified/selected while trying to transform an HTML document into RTF format (see col. 15), the Table is searched for the selected tag component (see col. 16, lines 64-66). Thus, the Table in Francis is a relationship between a tag and an object used to create the tag and not an element and a form and an HTML file. Further, there is no indication in Francis that the class in the Table is from a form.

Such a Table is clearly distinguishable from information or a mapping that indicates the transfer from a form (and not an object or a class) to an HTML file associated with the HTML page (as claimed). To equate a listing of objects and tags to a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page is not plausible and is improper. Thus, while Francis described tags and class ids, there is no fully displayed mapping that indicates the form where an object/element is obtained from or the HTML file that the object/element is placed in.

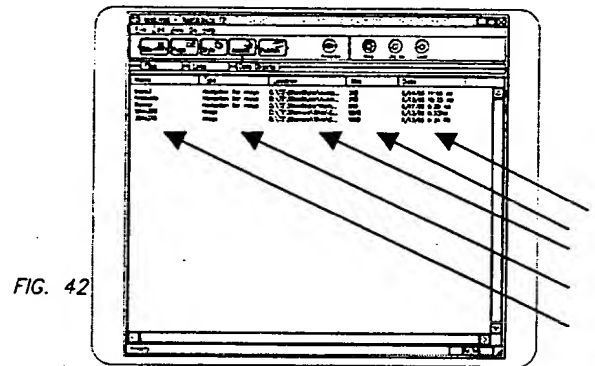
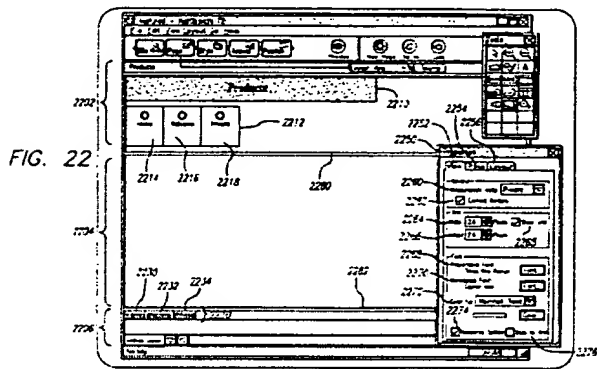
Additionally, the Table of Francis is used to convert HTML to RTF (see col. 14, line 56 - col 15 line 2). However, in the present invention, the end result is the display in a graphical user interface of a mapping that indicates the relationships. Such a display may then be manipulated and used as the user desires. Such a method, use, and result are clearly distinguishable from that of Francis.

The Office Action submits that Foley provides for the second element of the independent claims. However, while Foley may provide for processing an applet referenced in each web document (as indicated in the Office Action), such processing does not result in mapping the element to the HTML file. In Foley, the processing merely provides that the JWS browser pulls in and begins executing any referenced applets found in a Web document (see col. 5, lines 9-31). However, the present claims provide that the processing results in mapping an element that has been transferred from a form to an HTML page and not beginning the execution of the applets. Execution of an applet is clearly different from mapping. Accordingly, Foley fails to teach, disclose, or suggest the invention as claimed.

Additionally, even if Foley were combined with Francis, the result would be to process the applets in a web document (from Foley) and add them to a table of applets and their corresponding

tags (as in Francis). Such a teaching is clearly different from reading information and processing to obtain a mapping from the element to and HTML file.

The Office Action rejects the last claim element under Arora FIGS. 22 and 42 and col. 14, lines 32-36 and indicates that Foley fails to teach this element. However, as indicated in the prior Office Action response, FIGS. 22 and 42 and col. 14, lines 32-36 of Arora provide for an Assets Display that shows the files, links, and objects in a data processing system.



The assets shown in FIG. 42 are the draw objects for the products page of FIG. 22. Viewing FIG. 42, it appears that the Assets Display has a name of an object/file, the type of the object, a location of the object, a size of the object, and a date (see annotation). Thus, FIG. 42 merely provides a listing of the objects within a particular project. There is no mapping indicating an HTML file where the object is located. Furthermore, there is no indication or concept anywhere in FIG. 42 that the element has been transferred from a form to an HTML page. Listing objects found in a folder is not equivalent to displaying a mapping of elements from a form to an HTML file. Further, there is no suggestion to add a mapping from any other reference to the listing. The listing is merely a listing of very generalized information about objects in a particular project and the folder location where the object is stored. To contend that displaying a list of elements is equivalent to displaying particular specially obtained mapping information is improper. Accordingly, Arora fails to teach, disclose, or suggest the invention as claimed.

None of the cited references provides for all of the capabilities and details as claimed. Further, as described above, when combined, the references actually teach away from Applicants' invention. Additionally, the various elements of Applicants' claimed invention together provide operational advantages over the systems disclosed in Foley, Arora, Francis, and Lisle. In addition, Applicants' invention solves problems not recognized by Foley, Arora, Francis, and Lisle.

Thus, Applicants submit that independent claims 1, 12, 23, and 34 are allowable over Foley, Francis, and Arora. Further, dependent claims 2-11, 13-22, and 24-33 are submitted to be allowable over Foley, Arora, Francis, and Lisle in the same manner, because they are dependent on independent claims 1, 12, 23, and 34, respectively, and because they contain all the limitations of the independent claims. In addition, dependent claims 2-11, 13-22, and 24-33 recite additional novel elements not shown by Foley, Arora, Francis, and Lisle.

### III. CONCLUSION

Thus, as described above, Applicants have amended the claims to more clearly indicate that the mapping that is displayed indicates the relationship between the element, the form, and the HTML file. Such a relationship is more clearly defined in the dependent claims (e.g., the element name and HTML file name [of claim 4], the form name [of claim 5], etc. Accordingly, the user is able to identify an element, where an element came from (i.e., which form), and which HTML files the element is mapped to/used in based on the graphical user interface.

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectively solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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By their attorneys,

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## APPENDIX A: CLAIMS IN MARKED-UP FORM

1. (TWICE AMENDED) A method of displaying a relationship between an HTML file and an element from a form that is in the HTML file, comprising:
  - reading information from a project file, the information comprising a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page;
  - processing the information to map the element from the form to the HTML file; and
  - displaying the mapping on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.
12. (TWICE AMENDED) A apparatus for displaying a relationship between an HTML file and an element from a form that is in the HTML file, comprising:
  - means for reading information from a project file, the information comprising a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page;
  - means for processing the information to map the element from the form to the HTML file;
  - and
  - a display for presenting the mapping to a user on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.
23. (TWICE AMENDED) An article of manufacture, embodying logic to perform a method of displaying a relationship between an HTML file and an element that has been transferred from a form to an HTML page, the method comprising:
  - reading information from a project file, the information comprising a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page;
  - processing the information to map the element from the form to the HTML file; and
  - displaying the mapping on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.

34. (TWICE AMENDED) A computer readable data structure for representing a software project in a single file, the software project comprising a project application defined by executable programming logic, and a project environment for developing the application, the data structure comprising:

a first section comprising the executable programming logic needed to load and execute the project application in the computer; and

a second section for storing data required to restore the project environment, and for storing information comprising a relationship between elements that have been transferred from a form to an HTML page and HTML files associated with the HTML page in the project[.] ;

wherein the relationship between elements, the form, and the HTML file is capable of being displayed in a graphical user interface.



Receipt is hereby acknowledged for the following in the U.S. Patent and Trademark Office:

Applicant : Howard J. Glaser et al.

Serial No.: 09/162,685

Title: HTML MAPPING SUBSTITUTION GRAPHICAL USER INTERFACE FOR DISPLAY OF ELEMENTS  
MAPPED TO HTML FILES

Docket: ST9-98-052

Due Date: May 22, 2001

Date of Mailing: May 22, 2001

- ☒ Transmittal sheet, in duplicate, containing a Certificate of Mailing under 37 CFR 1.8.
- ☒ Amendment Under 37 C.F.R. 1.116 and Appendix showing Claims in Marked-up Form.
- ☒ Return postcard.

VGC/JSF/amb

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